

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PUREWICK CORPORATION,

Plaintiff,

v.

SAGE PRODUCTS, LLC,

Defendant.

C.A. No. 22-102-MN-JLH

**JOINT MOTION FOR TELECONFERENCE
TO RESOLVE DISCOVERY DISPUTES**

Pursuant to D.I. 47, PureWick and Sage respectfully move this Court to schedule a teleconference to address outstanding disputes regarding the following discovery matters:

- Sage's Motion to compel PureWick communications with inventors Camille and Ray Newton and documents related to PureWick's failure to preserve PureWick's email/document server.
- PureWick's Motion for a protective order to preclude Sage from pursuing third-party subpoenas seeking discovery on issues that are barred by collateral estoppel and/or res judicata.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in verbal meet-and-confer teleconferences on November 8, 2022 (regarding Sage's motion), November 23, 2022 (regarding Sage's motion) and December 13, 2022 (regarding PureWick's and Sage's motion).

Delaware Counsel:

- Plaintiff: Andrew E. Russell, Shaw Keller LLP (November 8, 2022); John W. Shaw, Shaw Keller LLP (November 23, 2022 and December 13, 2022)
- Defendant: Samantha G. Wilson, Young Conaway Stargatt & Taylor, LLP

Lead Counsel:

- Plaintiff: Nicola R. Felice and Jason C. Williams, Quinn Emanuel Urquhart & Sullivan, LLP
- Defendant: Christopher M. Scharff and Ryan J. Pianetto, McAndrews, Held & Malloy, Ltd.

The parties are available for a teleconference on the following dates: January 4-6, 2023.

Dated: December 19, 2022

SHAW KELLER LLP

YOUNG CONAWAY STARGATT
& TAYLOR, LLP

/s/ John W. Shaw

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